

THE HONORABLE BENJAMIN H. SETTLE

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

JOHN DOE #1, an individual; JOHN DOE
#2, an individual; and PROTECT
MARRIAGE WASHINGTON,

Plaintiffs,

v.

SAM REED, in his official capacity as
Secretary of State of Washington and
BRENDA GALARZA, in her official
capacity as Public Records Officer for the
Secretary of State of Washington,

Defendants.

No. C:09-cv-05456 BHS

DECLARATION OF ANNE LEVINSON IN
SUPPORT OF MOTION TO INTERVENE
AND IN SUPPORT OF WAFST'S BRIEF

I, Anne Levinson, declare:

1. I am an attorney licensed to practice in Washington, and am the Chair of Washington Families Standing Together ("WAFST"). I have personal knowledge of the facts set forth in this declaration and am competent to testify thereto.

2. WAFST is a statewide campaign, endorsed by individuals and more than 150 non-profit and faith-based groups that all support Engrossed Second Substitute Senate Bill 5688 that is the subject of Referendum 71.

3. WASFT filed suit in King County Superior Court on August 27, 2009 to address legal errors made by the Secretary of State related to the form and authentication of petitions and

DECLARATION OF ANNE LEVINSON
(No. C:09-CV-05456 BHS) – 1

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1 the acceptance of certain signers as registered voters. Attached hereto as Exhibit A is a true and
2 correct copy of the Complaint.
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4 4. WASFT also submitted a public records request under the Public Disclosure Act
5 to examine Referendum 71 signature "matches" that may have been made in error. Exhibit B is a
6 true and correct copy of that request. WASFT attempted to work cooperatively with the
7 Secretary of State to obtain these signatures, but the Secretary of State has stated that the Court's
8 current Temporary Restraining Order precludes release and WASFT's further review.
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15 I declare under penalty of perjury under the laws of the State
16 of Washington that the foregoing is true and correct.
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20 EXECUTED at Seattle, Washington, this 28th day of August, 2009.
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25 ANNE LEVINSON
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